

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CONGREGATION RABBINICAL COLLEGE OF  
TARTIKOV, INC., RABBI MORDECHAI BABAD, RABBI  
WOLF BRIEF, RABBI HERMEN KAHANA, RABBI MEIR  
MARGULIS, RABBI GERGELY NEUMAN, RABBI AKIVA  
POLLACK and KOLEL BELZ OF MONSEY,

Plaintiffs,

-against-

VILLAGE OF POMONA, NY; BOARD OF TRUSTEES OF  
THE VILLAGE OF POMONA, NY; NICHOLAS SANDERSON,  
AS MAYOR; IAN BANKS, ALMA SANDERS ROMAN,  
RITA LOUIE and BRETT YAGEL, AS TRUSTEES  
AND IN THEIR OFFICIAL CAPACITIES,

Defendants.

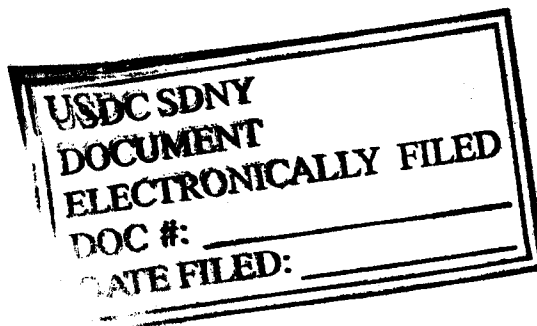
**NOTICE OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

Hon. Kenneth M. Karas

Please take notice that the undersigned will bring the above motion on for hearing  
before this Court at the United States Court House, 300 Quarropas Street, White Plains,  
New York, at a date and time to be set by the Court with notification provided to all counsel.

Dated: August 30, 2007  
Nanuet, New York

  
Paul Savad, Esq.(PS 5358)  
Susan Cooper, Esq.(SC 5433)  
Paul Savad & Associates  
55 Old Turnpike Road, Suite 209  
Nanuet, N.Y. 10954  
Phone: (845) 624-3820  
Email: paul@savadlaw.com  
Fax: (845) 624-3821



To: **Joseph L. Clasen, Esq.**  
**Robinson & Cole, LLP**  
**Attorneys for Defendants**  
**885 Third Avenue**  
**Suite 2800**  
**New York, New York 10022-4834**  
**(212) 451-2900**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
CONGREGATION RABBINICAL COLLEGE OF  
TARTIKOV, INC., RABBI MORDECHAI BABAD, RABBI  
WOLF BRIEF, RABBI HERMEN KAHANA, RABBI MEIR  
MARGULIS, RABBI GERGELY NEUMAN, RABBI AKIVA  
POLLACK and KOLEL BELZ OF MONSEY,

07 CV 06304

Plaintiffs,

-against-

**MOTION TO ADMIT  
COUNSEL  
PRO HAC VICE**

VILLAGE OF POMONA, NY; BOARD OF TRUSTEES OF  
THE VILLAGE OF POMONA, NY; NICHOLAS SANDERSON,  
AS MAYOR; IAN BANKS, ALMA SANDERS ROMAN,  
RITA LOUIE and BRETT YAGEL, AS TRUSTEES  
AND IN THEIR OFFICIAL CAPACITIES,

Hon. Kenneth M. Karas

Defendants.

-----X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts  
for the Southern and Eastern Districts of New York, I, Susan Cooper, Esq., a member in  
good standing of the bar of this Court, hereby move for an Order allowing the admission *pro*  
*hac vice* of

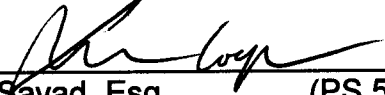
Applicant's Name: Roman P. Storzer, Esq.  
Firm Name: Storzer & Greene, P.L.L.C.  
Address: 1025 Connecticut Avenue, NW, Suite 1000  
City/State/Zip: Washington, D.C. 20036  
Phone Number: (202) 857-9766  
Fax Number: (202) 857-9799

Roman P. Storzer, Esq., is a member in good standing of the Bar of the States of  
Maryland and the District of Columbia.

There are no pending disciplinary proceedings against Roman P. Storzer, Esq., in  
any State or Federal court.

Dated: August 30, 2007  
Nanuet, New York

Respectfully submitted,

 15433  
\_\_\_\_\_  
Paul Savad, Esq. (PS 5358)

Susan Cooper, Esq. (SC 5433)

Paul Savad & Associates

55 Old Turnpike Road, Suite 209

Nanuet, N.Y. 10954

Phone: (845) 624-3820

Fax: (845) 624-3821

Email: paul@savadlaw.com

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Defendants.  
-----X

07 CV 06304

**AFFIDAVIT OF  
SUSAN COOPER, ESQ.  
IN SUPPORT OF  
MOTION TO ADMIT  
COUNSEL  
PRO HAC VICE**

Hon. Kenneth M. Karas

STATE OF NEW YORK     )  
                                  )  
COUNTY OF ROCKLAND )     ss:

SUSAN COOPER, ESQ., being duly sworn, hereby deposes and says as follows:

1. I am an attorney with Paul Savad & Associates, counsel for the Plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based upon my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Roman P. Storzer, Esq. as counsel *pro hac vice* to represent the Plaintiffs in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in February 1981. I am also admitted to the bar of the United

States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Roman P. Storzer, Esq., since at least 2004.

4. Mr. Storzer is an attorney with Storzer & Greene, and formerly worked for The Becket Fund, specializing in the Religious Land Use and Institutionalized Persons Act (RLUIPA) and constitutional law.

5. I have found Mr. Storzer to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Roman P. Storzer, Esq., *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Roman P. Storzer, Esq., *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Roman P. Storzer, Esq., *pro hac vice*, to represent Plaintiffs in the above-captioned matter be granted.

Dated: August 30, 2007  
Nanuet, New York

Sworn to before me on the  
30<sup>th</sup> day of August, 2007

Notary Public

Paul Savad  
Notary Public, State of New York  
No. 02SA6075754  
Qualified in Rockland County  
Commission Expires 06/10/10

Respectfully submitted,

  
SUSAN COOPER, ESQ. (5433)

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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CONGREGATION RABBINICAL COLLEGE OF  
TARTIKOV, INC., RABBI MORDECHAI BABAD, RABBI  
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07 CV 06304

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RITA LOUIE and BRETT YAGEL, AS TRUSTEES  
AND IN THEIR OFFICIAL CAPACITIES,

Defendants.

-----X  
**AFFIDAVIT IN SUPPORT OF  
MOTION TO ADMIT COUNSEL *PRO HAC VICE***

TO THE HONORABLE JUDGE OF SAID COURT:

Roman P. Storzer, a duly licensed attorney at law and a member in good standing of the bars of Maryland and the District of Columbia, respectfully requests leave of this Honorable Court to appear *pro hac vice* as co-counsel for all Plaintiffs in the above-referenced case and, in connection therewith, would respectfully show as follows:

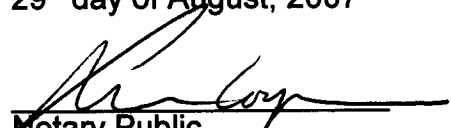
1. I am a duly licensed attorney and a member in good standing of the bars of Maryland Court of Appeals and the District of Columbia Court of Appeals. (Certificates of Good Standing are enclosed.)
2. I request leave of Court to appear as co-counsel for Plaintiffs at the special instance and request of said parties. I am experienced in the litigation of Federal constitutional matters and RLUIPA, which are the foundations of this action, and formerly served as Director of Litigation for The Becket Fund for Religious Liberty, which is a not-for-profit constitutional law firm.
3. I will serve as co-counsel herein with its local counsel, Paul Savad, Esq. of Paul Savad & Associates.

4. I am familiar with and will abide by the applicable Local Rules of the Southern District of New York.

8/29/07

  
Roman P. Storzer, Esq.

Sworn to before me on this  
29<sup>th</sup> day of August, 2007

  
Notary Public

**SUSAN COOPER**  
**Notary Public, State of New York**  
**No. 4989636**  
**Qualified in Rockland County**  
**Commission Expires 12/16/09**



## **CERTIFICATES**

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

***STATE OF MARYLAND, ss:***

*I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the nineteenth day of December, 1996,*

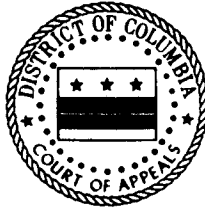
**Roman P. Storzer**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

***In Testimony Whereof, I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
twenty-first day of August, 2007.***

A handwritten signature in cursive script, reading "Alexander L. Cummings".

***Clerk of the Court of Appeals of Maryland***



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

Roman P. Storzer

was on the 11<sup>th</sup> day of September, 1998

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on August 21, 2007.

GARLAND PINKSTON, JR., CLERK

By: Christopher C. Dyer  
Deputy Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Index No. 07 CV 06304

Plaintiffs,

**AFFIDAVIT OF SERVICE**

- against -

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AS MAYOR; IAN BANKS, ALMA SANDERS ROMAN,  
RITA LOUIE and BRETT YAGEL, AS TRUSTEES AND IN  
THEIR OFFICIAL CAPACITIES,

Defendants.  
-----X

STATE OF NEW YORK, COUNTY OF ROCKLAND:

Illyana Flores, being duly sworn says: I am over 18 years of age and reside at Hillcrest,  
New York.

On August 31, 2007, I served a true copy of the annexed Notice of Motion to Admit  
Counsel Pro Hac Vice, by:

(X ) by depositing the same with an overnight delivery service in a wrapper  
Overnight properly addressed. Said delivery was made prior to the latest time  
Delivery designated by the overnight delivery service for overnight delivery.  
Service The address and delivery service are indicated below:

By United Parcel Service

Joseph L. Clausen, Esq.  
Robinson & Cole, LLP  
885 Third Avenue, Suite 2800  
New York, New York 10022-4834

  
ILLYANA FLORES

Sworn to before me this  
31<sup>st</sup> day of August, 2007

  
Notary Public

SUSAN COOPER  
Notary Public, State of New York  
No. 4989636  
Qualified in Rockland County  
Commission Expires 12/16/09